

Worksheet
Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

OFFICE: Tuscarora Field Office, Elko District

TRACKING NUMBER: DOI-BLM-NV-E020-2015-0021-DNA

CASEFILE/PROJECT NUMBER:

PROPOSED ACTION TITLE/TYPE: North Elko and Eureka Pipeline Project Imazapic Treatment DNA

LOCATION/LEGAL DESCRIPTION: Tuscarora Field Office

UTM point representing project location: N/A

APPLICANT (if any): N/A

A. Description of the Proposed Action and any applicable mitigation measures

This DNA analyzes the use of the active ingredient imazapic singly or as a tank mix with glyphosate for ground and/or aerial application within and adjacent to the North Elko Pipeline Project (NEPP) and Eureka Pipeline Project (EPP) right-of-way (BLM 2012 and BLM 2014). Imazapic is effective as a pre and post-emergent herbicide for the control of annual grasses and its application will facilitate ongoing restoration efforts in disturbed areas associated with pipeline construction. The Programmatic Environmental Assessment of Integrated Weed Management (IWM) on Bureau of Land Management Lands (BLM 1998) and Noxious Weeds Treatments Extension DNA (BLM 2011) currently exist for IWM including the use of herbicides on Elko District, but imazapic is not included in the initial analysis. However, site specific analysis has been conducted for imazapic in the Elko District Vegetation Treatment Maintenance Project EA (BLM 2010) and Tuscarora Sagebrush Habitat Restoration Initiative EA (BLM 2009), both of which tier to the Final Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (BLM 2007).

After review of the above mentioned documents, it has been determined that this DNA conforms to NEPA requirements. All best management practices (BMPs), standard operating procedures (SOPs), and design/mitigation features will be followed.

B. Land Use Plan (LUP) Conformance

LUP Name: Elko Resource Management Plan **Date Approved** 3/1987

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions):

Although the RMP is silent on the specific issue of weed management, noxious weed treatments proposed by this DNA are consistent with the objectives and goals for wildlife habitat and range restoration since noxious weed treatments are intended to improve wildlife habitat and help restore healthy rangelands. In addition this action is consistent with all federal, state and local laws and regulations.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

- BLM. 1998. Programmatic Environmental Assessment of Integrated Weed Management on Bureau of Land Management Lands (EA # BLM/EK/PL-98/008).
- BLM. 2007. Final Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Impact Statement (PEIS).
- BLM. 2009. Tuscarora Sagebrush Habitat Restoration Initiative Environmental Assessment (BLM-NV-E020-2010-01-EA).
- BLM. 2010. Elko District Vegetation Treatment Maintenance Project Environmental Assessment (DOI-BLM-NV-N010-2010-00005-EA). BLM 2010.
- BLM. 2011. Noxious Weeds Treatments Extension DNA. (DOI-BLM-NV-N010-2011-003-DNA).
- BLM. 2012. North Elko Pipeline Project Environmental Assessment. (DOI-BLM-NV-N020-2012-0018-EA).
- BLM. 2014. Eureka Pipeline Project Environmental Assessment. (DOI-BLM-NV-N020-2014-0002-EA).

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

None

D. NEPA Adequacy Criteria

- 1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

The new proposed action is similar to the proposed actions described and selected for implementation in the BLM 2010 and BLM 2009 EAs. The NEPP and EPP right-of-ways are located within the same geographic areas of analysis. Furthermore, the specific project areas identified within each EA occur in predominantly sagebrush ecosystems and are sufficiently similar to resource conditions found along both the NEPP and EPP right-of-way.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

The range of alternatives analyzed in the existing NEPA documents remains appropriate with respect to the current proposed action. Relevant resource issues and concerns were adequately analyzed and addressed in existing EA documents through BMPs, SOPs, and/or design features and mitigation measures.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

The wildlife species on the 2011 Nevada BLM Sensitive Species list and Federally-listed species are collectively referred to as Nevada BLM Special Status Species. The recent changes to the analysis include the designation of the Greater Sage-Grouse as a Candidate species in March 2010 and the de-listing of the Bald Eagle in 2007 under the Endangered Species Act (ESA). This change does not affect the existing analysis or its application to the proposed action. The treatments being proposed under this DNA would have a positive benefit towards the improvement of the habitat of Bald Eagle prey species and the restoration of Sage-Grouse habitat. Moreover, the Proposed Action for the subject North Elko and Eureka Pipeline Project Imazapic Treatment DNA, that includes reference to Best Management Practices and Standards Operating Procedures provided by the 1998 Programmatic EA along with the BMPs and SOPs from the 2007 PEIS, would mitigate the effects of chemical application in areas occupied by BLM Special Status Species (including Federally-listed species under the ESA) as well as other wildlife species.

Lands with wilderness characteristics (LWC) must be assessed per BLM Manual 6310 – Conducting Wilderness Characteristics Inventory on BLM Lands (Public) under Section 201 of the Federal Land Policy and Management Act of 1976. The NEPP EA (BLM 2012) to which this DNA references, was completed prior to the issuance of the LWC manual and the right-of-way footprint intersects two areas with LWC. Chemical treatment of noxious weeds would not preclude making a LWC determination. The size criterion could still be met; any impacts to naturalness would be substantially unnoticeable; and opportunities for solitude or primitive and unconfined types of recreation would not be impacted. The EPP EA (BLM 2014), also referenced in this DNA, does not include LWC areas large enough along the right-of-way footprint to meet the size criteria and is therefore not analyzed further.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

The direct, indirect, and cumulative effects are the same as those outlined in the EAs and EIS. The methods of weed control have remained consistent since that time including the inherent risks involved (i.e. spills, soil disturbance, water contamination, overspray, etc.). Some of the Threatened and Endangered species that could potentially be affected have changed. But in order to provide protection to these species or archeological sites SOPs are provided.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Several federal, state, county, and private entities were involved in the creation of the existing NEPA documents, and therefore public involvement and review associated with existing NEPA documents is adequate for the current proposed action.

E. Persons/Agencies/BLM Staff Consulted

NAME	TITLE	RESOURCE/AGENCY REPRESENTED	INITIALS & DATE
Tom Milter	Archeology Technician	Archaeology	/s/TM 4/1/15
Terri Dobis	NEPA Coordinator	NEPA	/s/TKD 4/3/15
Sam Cisney	Natural Resource Specialist (Weeds)	Noxious Weeds and Invasive Plants	/s/SC 3/31/15
Jerrie Bertola	Range Management Specialist	Range	/s/JER for JB 4/1/2015
Marissa Murphy	Realty Specialist	Realty/Lands	/s/MM 3/31/15
Zach Pratt	Outdoor Recreation Planner	Recreation and Visual Resources/Wilderness/Wild and Scenic Rivers	/s/ZP 3/31/15
Tom Schmidt	Geologist/Hazardous Material	Waste (Hazardous or Solid)	/s/TS 3/31/15
Ken Wilkison	Wildlife Biologist	Wildlife	/s/CE for KW 3/31/15

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

Conclusion *(If you found that one or more of these criteria is not met, you will not be able to check this box.)*

[] Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

_____/s/Samantha Cisney 3/31/15
Signature of the Project Lead

_____/s/Terrell K. Dobis 4/3/15
Signature of the NEPA Coordinator

_____/s/Richard E. Adams
Signature of the Responsible Official

_____/4/6/15
Date

Note: The signed Conclusion on this worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.